

NATHANIEL THOMAS PETTIFORD, JR. § NUMBER: 12-1315

VERSUS § 4th JUDICIAL DISTRICT COURT

GRAPHIC PACKAGING
INTERNATIONAL, INC. § OUACHITA PARISH, LOUISIANA

AFFIDAVIT

STATE OF LOUISIANA

PARISH OF OUACHITA

BEFORE ME, personally came and appeared, Chad Johnson, who after being duly sworn did depose and state that:

1.

He is employed at the Graphic Packaging International, Inc. [hereafter, GPI] facility in West Monroe, Louisiana as the PM6 Salary Planner.

2.

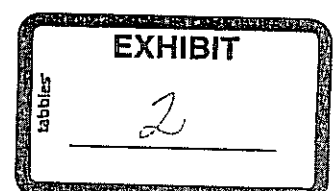
His job duties require him to be familiar with the work performed at GPI's plant in West Monroe, Louisiana and he is also required to obtain to write requisitions for purchases. He receives quotes from buyers to perform the necessary work.

3.

Attached hereto as part of Exhibit A, in globo, is Purchase Order No. 4503442676 whereby GPI contracted with B&D Technical Services, Inc., ("B&D," herein) with the applicable General Terms and Conditions governing the agreement between GPI and B&D whereby B&D agreed to provide and did provide time and material, supervision, labor, tools and materials. B&D was working directly for him pursuant to this purchase order.

4.

The attached purchase order number 4503442676 with the applicable general terms and conditions that were physically attached to the purchase order covers the work Nathaniel Pettiford was performing at the time of his accident at GPI's facility in West Monroe, Louisiana on May 25, 2011.



5.

The general description of the job was to change the bearings and gears on idler gear cluster set #42. The job took place on the #6 Paper Machine during the May 25th 2011 outage.

6.

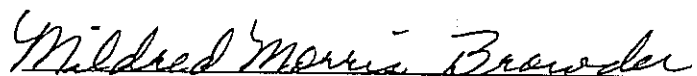
The General Terms and Conditions attached to purchase order No. 4503442676, provide in Section 13 that, pursuant to the provisions of La. R.S. 23:1061(a)(3), GPI is the statutory employer of B&D's employees.

7.

All of the above facts are based on Appearer's personal knowledge gained during his experience working at the GPI West Monroe facility and his position as the PM6 Salary Planner.


CHAD JOHNSON

SWORN TO AND SUBSCRIBED before me, Notary Public, this 2nd day of August, 2012.


NOTARY PUBLIC #16104